

Notice of Privacy Practices

Holding Space Therapy PLLC | Gina Meyer, LMSW

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Privacy contact: Gina Meyer, LMSW, at the phone number or address above.

Effective date: October 4, 2026

This notice explains how your health information may be used and disclosed, how you may obtain it, and your privacy rights. Please review it carefully.

Your rights

Access and correct your information

You may ask to inspect or receive an electronic or paper copy of your record and other health information we maintain about you. We will respond within the time required by law, usually within 30 days, and may charge a reasonable, cost-based fee where permitted. You may ask us to correct information you believe is inaccurate or incomplete. If we deny a correction request, we will explain the reason in writing, usually within 60 days.

Request privacy protections

You may ask us to contact you in a particular way or at a different address; we will accommodate reasonable requests. You may ask us to limit certain uses or disclosures for treatment, payment, or health care operations. We do not have to agree to every request. If you pay in full out of pocket for a specific service, you may request that we not disclose information about that service to your health plan for payment or health care operations. We will honor that request unless disclosure is required by law.

Obtain an accounting and a copy of this notice

You may request an accounting of certain disclosures of your health information during the preceding six years. We will provide one accounting in a 12-month period without charge and may charge a reasonable, cost-based fee for additional accountings. You may ask for a paper copy of this notice at any time, even if you agreed to receive it electronically. Additional accounting rights may apply to substance use disorder records protected by 42 CFR Part 2.

Choose a representative and file a complaint

A person with legal authority to act for you, such as a legally authorized guardian or holder of applicable medical power of attorney, may exercise your privacy rights. We will verify that authority. If you believe your privacy rights have been violated, contact Gina Meyer using the contact information above or file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights at hhs.gov/hipaa/filing-a-complaint or 1-877-696-6775. We will not retaliate against you for filing a complaint.

Your choices

You may tell us your preferences about sharing information with family, friends, or others involved in your care or payment for care, and about sharing in a disaster relief situation. We will follow your wishes when required by law. If you cannot tell us your preference, we may share information when we believe it is in your best interest or needed to reduce a serious and imminent threat, as permitted by law. Paying for your care alone does not give someone authority to make treatment decisions or obtain your full record.

We will obtain written authorization when required for marketing uses, the sale of health information, and most uses or disclosures of psychotherapy notes. We do not sell your health information. You may revoke an authorization in writing, except to the extent we already acted on it.

How we use and disclose health information

Treatment, payment, and practice operations

We may use and disclose health information to provide and coordinate your care, consult with other treating professionals, bill and collect payment, send appointment reminders, and operate this practice. For example, we

may share relevant information with another professional treating you, or provide billing information to a health plan if you ask us to submit a claim. When another law provides stronger protection, we follow that law.

Other uses permitted or required by law

Subject to applicable legal limits, we may use or disclose information for public health and safety activities, reports of suspected abuse or neglect, health oversight, research under applicable safeguards, workers' compensation, certain law enforcement or government functions, organ or tissue donation requests, and coroners or medical examiners. We may disclose information when a law requires it or in response to appropriate legal process, such as a qualifying court order or subpoena. We review legal requests before disclosing information; special protections may apply to psychotherapy notes and substance use disorder records.

Psychotherapy notes

I maintain separate psychotherapy notes as defined by HIPAA. These are distinct from the progress notes in your clinical record. Most uses or disclosures of these separate notes require your written authorization. HIPAA allows limited exceptions, including my use of the notes in your treatment, certain training or supervision, defense of a legal action brought by you, oversight of my compliance, disclosures required by law, and certain serious safety situations.

Substance use disorder records protected by 42 CFR Part 2

If we maintain or receive records protected by 42 CFR Part 2, additional federal protections may apply. Uses and disclosures for treatment, payment, and health care operations may require your consent under Part 2. Those records, and testimony about them, generally cannot be used or disclosed in civil, criminal, administrative, or legislative proceedings against you without your specific written consent or a qualifying court order and subpoena or other legal process as required by Part 2. Once disclosed with the applicable consent, information may be redisclosed by a recipient as federal law permits. If we maintain separately defined substance use disorder counseling notes, their use or disclosure generally requires a separate written consent. We will provide any required opportunity to opt out before using Part 2 records for fundraising; we do not currently use client records for fundraising.

Our responsibilities

We are required to protect the privacy and security of your protected health information, follow the duties and practices in the notice currently in effect, and give you a copy of that notice. We will notify you if a breach occurs that may have compromised the privacy or security of your information, as required by law. We will not use or disclose information in ways outside this notice unless you authorize it in writing or law permits or requires it. We will comply with applicable Michigan and federal protections when they are more restrictive than the general uses described here.

Changes and questions

We may revise this notice. A revised notice may apply to information we already have as well as information we receive later. The current notice will be available upon request, at our office, and on our website. Contact Gina Meyer, LMSW, at 616-537-2341 or the address above with privacy questions or requests.

Acknowledgment in the Client Portal confirms receipt of this notice; it does not mean that you agree to every possible use or disclosure.